



May 2, 2022

The Honorable Michal Freedhoff
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: Request for Online Publication of Pesticide Incident Reports

Dear Assistant Administrator Freedhoff,

To further transparency, we would like to request that pesticide incident data reporting database be made available online to the public. The centralized Incident Data System (IDS) provides valuable information on pesticide incidents involving people, wildlife, pets, domestic animals, and plants. These incident reports are an important way to alert the public to potential hazards and unanticipated harms cause by pesticides, as well as alerting the public to those situations where the EPA has failed to take needed corrective action.

Despite the value of these data, the only way to access them is through requests made under the Freedom of Information Act (FOIA) and an understanding of how the EPA classifies and categorizes incident data. As a result, obtaining useful data from this system is not feasible for most members of the public.

The release of incident data for Seresto pet collars illustrates how the public can have a very strong interest in potentially harmful and even deadly impacts of a pesticide. Despite tens of thousands of incident reports submitted to the EPA, the public was never alerted in any way about the collar's potential danger until the incident data was finally requested and released via FOIA. If these data had been made public, people may have been aware of previously undisclosed harms and risks associated with these collars and could have made an informed risk calculus on whether to use this product or another one.

We recognize the budgetary constraints for the Office of Pesticide Programs (OPP). However, publicly posting an existing database to a website should not be excessively burdensome, and may lead to an overall reduction in the time and resources spent by OPP responding to FOIA requests for this information. To minimize FOIA requests and maximize efficiency, the online IDS database should provide adequate information to alert the public to the number of incidents and the magnitude of reported harms associated with a pesticide.

The public has a right to know the facts on risk associated with pesticide products without having to navigate the FOIA process. These reports are critical to warning people of potential pesticide risks when the EPA fails affirmatively do so, and they should be made available online for public inspection.

Thank you considering our request.

Sincerely,

A handwritten signature in black ink, reading "Lori Ann Burd". The signature is written in a cursive, flowing style.

Lori Ann Burd
Environmental Health Director
Center for Biological Diversity
laburd@biologicaldiversity.org

George Kimbrell
Legal Director
Center for Food Safety
gkimbrell@centerforfoodsafety.org